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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Yuliia Petlinska and Maksym Motolin,

Plaintiffs,

v.

Kika Scott, Senior Official Performing the
Duties of the Director, U.S. Citizenship and
Immigration Services,

Defendant.

Case Number: 2:25-cv-00331-JCM-NJK

JOINT STIPULATION

This action was brought by Plaintiffs Yuliia Petlinska and Maksym Motolin seeking, among other things, an order from this Court directing United States Citizenship and Immigration Services ("USCIS") to adjudicate their pending applications for Temporary Protected Status

1 (“TPS”) before April 28, 2025. On March 10, 2025, Plaintiffs filed a Motion for Preliminary
2 Injunction (*see* ECF Nos. 15 & 16), which is currently pending.

3 The parties have conferred and hereby jointly stipulate to the following resolution of this
4 action:

5 1. By April 26, 2025, USCIS will issue a final decision on the pending applications
6 for TPS filed by Plaintiffs Yuliia Petlinska and Maksym Motolin, subject to paragraph 3 *infra*.

7 2. If USCIS issues a Request for Evidence (“RFE”) on the pending TPS application(s),
8 such RFE(s) shall be issued on or before April 1, 2025.

9 3. In the event USCIS issues an RFE on one or both TPS applications, Plaintiffs must
10 submit a response by April 14, 2025 in order for USCIS to issue a final decision on the TPS
11 application(s) by April 26, 2025.

12 4. Plaintiff Yuliia Petlinska will file a Form I-526E Immigrant Petition by Regional
13 Center Investor no later than May 9, 2025.

14 5. Plaintiffs Yuliia Petlinska and Maksym Motolin request that the Court withdraw
15 their pending Motion for Preliminary Injunction (ECF Nos. 15 & 16).

16 6. Upon the final adjudication of Plaintiffs’ TPS applications, Plaintiffs will
17 voluntarily dismiss this action, under Federal Rule of Civil Procedure 41(a)(1)(A)(i), with the
18 parties bearing their own attorney’s fees and litigations costs.

19 7. This stipulation and any actions taken pursuant to it do not constitute any admission
20 by Defendants of negligence or wrongdoing by Defendants and shall not be construed as a
21 concession by Defendants as to any of Plaintiffs’ claims in this action.

22 8. The Parties agree that this Court shall retain jurisdiction to enforce the terms of this
23 stipulation. *See Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375, 381-82 (1994).

24 WHEREFORE, the parties respectfully ask the Court to enter the attached Proposed Order
25 withdrawing Plaintiffs’ motion for preliminary injunction and staying this case pending the
26 Parties’ performance as provided above.

1 Dated: March 21, 2025

Respectfully submitted,

2
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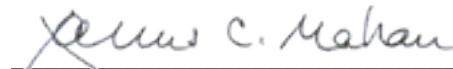
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ORDER

This matter is before the Court on the parties' Joint Stipulation, filed on March 21, 2025. Pursuant to the stipulation, it is hereby **ORDERED** that Plaintiffs' motion for preliminary injunction is withdrawn, this action is stayed, and the Parties are directed to perform consistent with their agreement. This Court retains jurisdiction to enforce the terms of the Parties' stipulation. *See Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375, 381-82 (1994).

IT IS SO ORDERED.

Dated: March 31, 2025.



Hon. James C. Mahan
UNITED STATES DISTRICT JUDGE